

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

<u>Boston Edison Company</u>)
<u>Cambridge Electric Light Company</u>)
<u>Commonwealth Electric Company</u>)
<u>d/b/a NSTAR Electric</u>)

D.T.E. 03-121

The following instructions apply to this set of information requests and all subsequent information requests issued by Conservation Law Foundation in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, CLF-NSTAR-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if NSTAR or its witnesses receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to “any and all”, “documentation”, “support”, and “justification” mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records, reports, bills, checks, articles from journals or other sources, and other compilations from which information can be obtained, and all copies of documents that bear notations or other markings that differentiate such copies from the original.
6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact Seth Kaplan at (617) 350-0990 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.

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First Set of Information Requests of
Conservation Law Foundation to
NSTAR Electric

- CLF-NSTAR-1-1 Refer to Mr. LaMontagne's rebuttal testimony (Exhibit NSTAR-HCL-7), p. 20. On lines 21-23 Mr. LaMontagne states that "... to the extent that customers desire firm standby service, the proposed standby rate should not have a large effect on the economics of those types of renewable DG technologies." Please elaborate upon this analysis, explaining with specificity what range or amount of "effects on ... economics" was considered to be "not ... large" by Mr. LaMontagne and provide a detailed explanation for his conclusion, including all documents and work papers used in said analysis.
- CLF-NSTAR-1-2 Refer to Mr. LaMontagne's rebuttal testimony (Exhibit NSTAR-HCL-7), p. 20. Specifically, on lines 7-11 Mr. LaMontagne responds to a question regarding Mr. Michelman's statement that the proposed rate "reduces incentives to install larger rather than smaller wind turbines" without explicitly stating whether he agrees that the rate would have such an effect. Please clarify Mr. LaMontagne's response to state with precision whether he agrees that the rate would have the effect of reducing "incentives to install larger rather than smaller wind turbines".
- CLF-NSTAR-1-3 Refer to Mr. LaMontagne's rebuttal testimony (Exhibit NSTAR-HCL-7), p. 20 and the new tariff proposed in NSTAR-HCL-10. Does the new tariff proposed in NSTAR-HCL-10 have the effect of reducing incentives to install larger rather than smaller wind turbines? In particular, what effect would the new tariff have on the economic incentives of the customers discussed by Mr. Michelman in his testimony to install a 2 MW wind turbine instead of a 250 kW wind turbine?

Dated: April 26, 2004